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## RHÔNE-POULENC INC. DRGANIC CHEMICALS DIVISION

7/19/88

9229 E. Marginal Way South - P.O. Box 80963 - Seattle, Washington 98108 - Telephone: (206) 764-4450

July 19, 1988



Certified Mail
Return Receipt Requested

Mr. Charles W. Rice, Chief RCRA Compliance Section U.S. Environmental Protection Agency, Region 10 1200 Sixth Avenue, HW-112 Seattle, Washington 98101

Re: Notice of Violation and Warning, and Request for Information - Environmental Protection Agency Identification Number WAD009282302

Dear Mr. Rice:

Please consider this letter as our response to the above Notice which we received on June 20, 1988.

We are very concerned that there has been a misunderstanding concerning the requirements applicable to Notice of Transfer of our Seattle facility from Monsanto to Rhone-Poulenc, and want to reassure both EPA and the Washington Department of Ecology ("WDOE") that we provided timely notice in the manner recommended to us. Nevertheless, we understand the request for revisions to permit file documents and enclose the following:

- Revised Part A Hazardous Waste Permit Application-Forms 1 and 3
- Hazardous Waste Facility Certificate of Liability Insurance
- Closure Letter of Credit

Prior to Rhone-Poulenc's purchase of the Seattle Plant from Monsanto, contacts were made with various permitting agencies concerning the specific requirements for transfer and related filings. The advice received was to the effect that Rhone-Poulenc should notify the agencies, and that an amended Part A application was optional. A revised Notification of Dangerous Waste Activities (Form 2) was sent to Messers. Saunders, Bruno, and Conroy at the WDOE on September 30, 1986; and on October 10, 1986, Rhone-Poulenc confirmed by letter its intent to close the waste storage area at its facility, in accordance with the Closure Plan previously filed on August 18, 1986.



Rhone-Poulenc understood that the storage area at the plant was covered by financial security requirements provided by Monsanto. As a request for closure in accordance with filed Closure Plan was pending with the WDOE, we were unaware and not advised in connection with transfer requirements that any special action was required by Rhone-Poulenc. In this regard, we do not have direct knowledge that the financial responsibility requirements posted by Monsanto expired or were otherwise inadequate during the transition and closure process. Additionally, the DOE regulations applicable at the time of the ownership transfer did not contain a 6-month deadline for change of ownership. Please refer to the prior version of WAC173-303-805(d).

Finally, the third claimed violation involved the numbering of one waste — — the subclassification of waste methylene chloride. In particular, the original Part A application listed spent methylene chloride as "F001" (which is correct for degreasing uses of methylene chloride) instead of "F002" (which is correct for general uses of methylene chloride). This classification was of no significant consequence, and the F002 designation has been used in the plant's annual Dangerous Waste Reports to the WDOE, as well as in a recently revised WDOE Form 2, Notification of Dangerous Waste activities.

As demonstrated above, we believe firmly that the EPA and WDOE were provided with all of the substantive information and notifications concerning transfer in a timely fashion. Under any fair view of the facts, earnest efforts were made to obtain guidance on transfer requirements and Rhone-Poulenc followed those instructions, in good faith. Additionally, we believe that the numbering issue with respect to spent methylene chloride was of no consequence and was, in fact, clarified by annual reporting designations. For these reasons, we trust that the enclosures clarify the file records, and that you will agree that neither a citation nor a penalty is justified.

Sincerely,

Sue E. Hays

Governmental Affairs Superintendent

cc: Ms. Julie Sellick, WDOE

Lue E. Hays

Hazardous Waste Section Supervisor

**Enclosures** 

GENERAL INFORMATION  (Read on Communication Page 1)  (Read on Communication Page 2)  (Read on	-	are spaced for e	lite type, i.e., 12 characters/inch	-				Form Approved Civis No. 1.	00-110	775	
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G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids to storage of liquid hydrocarbons? If CRM 4)  H. Do you or will you inject at this facility fluids for special process such as mining of sulfur by the Frisch process, solution mining of minerals, in situ combustion of lossif fuel, or recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? If CRM 4)  If the variety of the var				X		X	taining, within one qua	rter mile of the well bore,		X	
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in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)  1. Is this facility a proposed stationary source which is sone of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the constructions and which will potentially emit 100 tons provided under the construction of constructions and which will potentially emit 100 tons provided under the construction of constructions and which will potentially emit 100 tons provided under the construction of construction and which will potentially emit 100 tons provided under the construction of construction and which will potentially emit 100 tons provided under the construction of construction and which will potentially emit 100				7			H. Do you or will you inject	t at this facility fluids for spe-	100		
Out-the, ringer fluids state fluids for storage of liquid high or natural gas, or inject fluids for storage of liquid high or natural gas, or inject fluids for storage of liquid high or natural gas, or inject fluids for storage of liquid high or natural gas, or inject fluids for storage of liquid high or natural gas, or inject fluids for storage of liquid high or natural gas, or inject fluids for storage of liquid high or natural gas, or inject fluids for storage of liquid high or natural gas, or inject fluids for storage of liquid high or inject fluids gas and state on the state of t	in conr	nection with con	iventional oil or natural gas pro-		~				100	V	
hydrocarbons? (FORM 4)  1. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clan Air Act and may affect or be located in an attainment area? (FORM 5)  11. NAME OF FACILITY  13. IN PARCILITY CONTACT  A. NAME & TITLE (last, first, & title)  A. STREET OR P.O. BOX  A. STREET OR P.O. BOX  A. STREET OR P.O. BOX  B. CITY OR TOWN  A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER  B. COUNTY NAME  C. CITY OR TOWN  C. STATE E. ZIP CODE  F. COUNTY CODE  (If Anough)  B. COUNTY CODE  (If Anough)  C. CITY OR TOWN  C. STATE E. ZIP CODE  F. COUNTY CODE  (If Anough)  B. COUNTY CODE  (If Anough)  C. CITY OR TOWN  C. STATE E. ZIP CODE  F. COUNTY CODE  (If Anough)  A. STATE E. ZIP CODE  F. COUNTY CODE  (If Anough)					1		tion of fossil fuel, or rec			$  \wedge  $	
one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)  III. NAME OF FACILITY  SKIP R H ONE - POULENC INC  I SKIP R H ONE - POULENC INC  A. NAME & TITLE (last, first, & title)  B. PHONE (area code & no.)  2 SUE E HAYS GOVT AFFAIRS SUPT 206 70 Y 4 450  V. FACILITY MAILING ADDRESS  A. STREET OR P.O. BOX  3 PO BOX 80963  B. CITY OR TOWN  A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER  B. COUNTY NAME  C. CITY OR TOWN  C. STATE E. ZIP CODE F. COUNTY CODE (if farours)  C. CITY OR TOWN  C. STATE E. ZIP CODE F. COUNTY CODE (if farours)  B. COUNTY NAME  C. CITY OR TOWN  C. CITY OR TOWN  C. STATE E. ZIP CODE F. COUNTY CODE (if farours)  C. CITY OR TOWN  C. STATE E. ZIP CODE F. COUNTY CODE (if farours)  B. CITY OR TOWN  C. STATE E. ZIP CODE F. COUNTY CODE (if farours)	hydroc	arbons? (FORM	4)		35	36			37	38	39
structions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)  III. NAME OF FACILITY  SKIP R H O N E - POULENC TNC  III. NAME OF FACILITY  III. FACILITY CONTACT  A. NAME & TITLE (last, first, & title)  B. PHONE (area code & no.)  IV. FACILITY MAILING ADDRESS  A. STREET OR P.O. BOX  3 PO BOX 80963  A. STREET OR P.O. BOX  3 PO BOX 80963  A. STREET, ROUTENO. OR OTHER SPECIFIC IDENTIFIER  B. COUNTY NAME  K I N G  C. CLITY OR TOWN  D. STATE E. ZIP CODE  WA 98108  C. CLITY OR TOWN  D. STATE E. ZIP CODE  WA 98108  WA 98108  C. CLITY OR TOWN  D. STATE E. ZIP CODE  WA 98108  C. CLITY CONTY CODE  (If known)											
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attainment area? (FORM 5)  II. NAME OF FACILITY  III. NAME OF FACILITY  SKIP R H O N E - P O U L E N C I N C  IV. FACILITY CONTACT  A. NAME & TITLE (last, first, & title)  B. PHONE (area code & no.)  2 SUE E HAYS GOVT A FFA RS SUPT 2 0 0 7 6 4 4 4 5 0  V. FACILITY MAILING ADDRESS  A. STREET OR P.O. BOX  3 P O B O X 80 9 6 3  B. CITY OR TOWN  C. STATE D. ZIP CODE  WA 9 8 1 0 8  VI. FACILITY LOCATION  A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER  VI. FACILITY LOCATION  A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER  K I N G  C. CITY OR TOWN  D. STATE E. ZIP CODE F. COUNTY CODE  (If Anown)  G S F A T T L E  WA 9 8 1 0 8  V. WA 9 8 1 0 8	per ye	ar of any air	pollutant regulated under the		1				RLU	$  \wedge  $	
IS SKIP R HONE - POULENC INC  IS 16 - 22 100  IV. FACILITY CONTACT  A. NAME & TITLE (last, first, & title)  B. PHONE (area code & no.)  V. FACILITY MAILING ADDRESS  A. STREET OR P.O. BOX  3 PO BOX 80963  B. CITY OR TOWN  C. STATE D. ZIP CODE  WAA 98108  VI. FACILITY LOCATION  A. SYREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER  C. Q 2 2 9 E A'ST MARSINAL WAY SOUTH  B. COUNTY NAME  KING  C. CITY OR TOWN  D. STATE E. ZIP CODE  F. COUNTY CODE  WAA 98108  WAA 98108  WAA 98108  WAA 98108				40	41	42		or be located in an attainment	43	44	45
IV. FACILITY CONTACT  A. NAME & TITLE (last, first, & title)  B. PHONE (area code & no.)  2 SUE E HAYS GOVT A.F.F.A.I.R.S SUPT 204 74450  V. FACILITY MAILING ADDRESS  A. STREET OR P.O. BOX  B. CITY OR TOWN  A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER  5 9 2 2 9 E AST MARS I NAL WAY SOUTH  5 9 2 2 9 E AST MARS I NAL WAY SOUTH  5 15 15 15 15 15 15 15 15 15 15 15 15 15	III. NAME	OF FACILITY									
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C. CITY OR TOWN  C. CITY OR TOWN  D. STATE E. ZIP CODE F. COUNTY CODE (If known)  WA 98 1 0 8											
6 S E A T T L E WA 98 108	46		C. CITY OR TOWN				n sacarde E 719 COS				
40 41 42 47 - 51 52 - 54	c 1 1		TITITITI	1	1	111					
	65 E A	1166					WA 4810	8			
	EPA Form 3	510-1 (6-80)					41 41 47 47	THE RESERVE AND ADDRESS OF THE PARTY OF THE	NIIF	ON P	EVERSE

CONTINUED FROM THE FRONT	ر د د
VII. SIC CODES (4-digit, in order of priority)  A. FIRST	B. SECOND
72,86,9 Industrial Organic Chemicals 7	pecify)
C. THIRD	D. FOURTH
(specify) (specify) 7 (specify)	specify)
VIII. OPERATOR INFORMATION	B. Is the name listed in
8 RHONE-POULENC INC	Item VIII-A also the owner?  YES NO
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", sp  F = FEDERAL	D. PHONE (area code & no.)  A 206 764 4450  15 16 - 18 19 - 21 22 - 25
E. STREET OR P.O. BOX  PO BOX 80963	
B S E A T T L E WA S	IX. INDIAN LAND  Is the facility located on Indian lands?  YES NO  51
X. EXISTING ENVIRONMENTAL PERMITS  A. NPDES (Discharges to Surface Water)  D. PSD (Air Emissions from Proposed South Proposed	rces)
B. UIC (Underground Injection of Fluids)  E. OTHER (specify)  9 U  15 16 17 18  30 18 18 17 15	(specify) METRO (POTW)
C. RCRA (Hazardous Wastes)  E. OTHER (specify)  R WAD 009282302 9  IS 16 17 18  XI. MAP	(specify)
Attach to this application a topographic map of the area extending to at least one mile the outline of the facility, the location of each of its existing and proposed intake ar treatment, storage, or disposal facilities, and each well where it injects fluids undergraph water bodies in the map area. See instructions for precise requirements.	nd discharge structures, each of its hazardous waste
XII. NATURE OF BUSINESS (provide a brief description)	
Vanillin manufacturing	X INSPESSED WIND
SETTING THE STREET	THE PART OF THE PA
XIII. CERTIFICATION (see instructions)	
I certify under penalty of law that I have personally examined and am familiar with to attachments and that, based on my inquiry of those persons immediately responsible application, I believe that the information is true, accurate and complete. I am aware false information, including the possibility of fine and imprisonment.	ble for obtaining the information contained in the e that there are significant penalties for submitting
James P. Reilly Vice President/General Manager - Pt	C. DATE SIGNED 7/18/88
COMMENTS FOR OFFICIAL USE ONLY  C	1111111111
EPA Form 3510-1 (6-80) REVERSE	

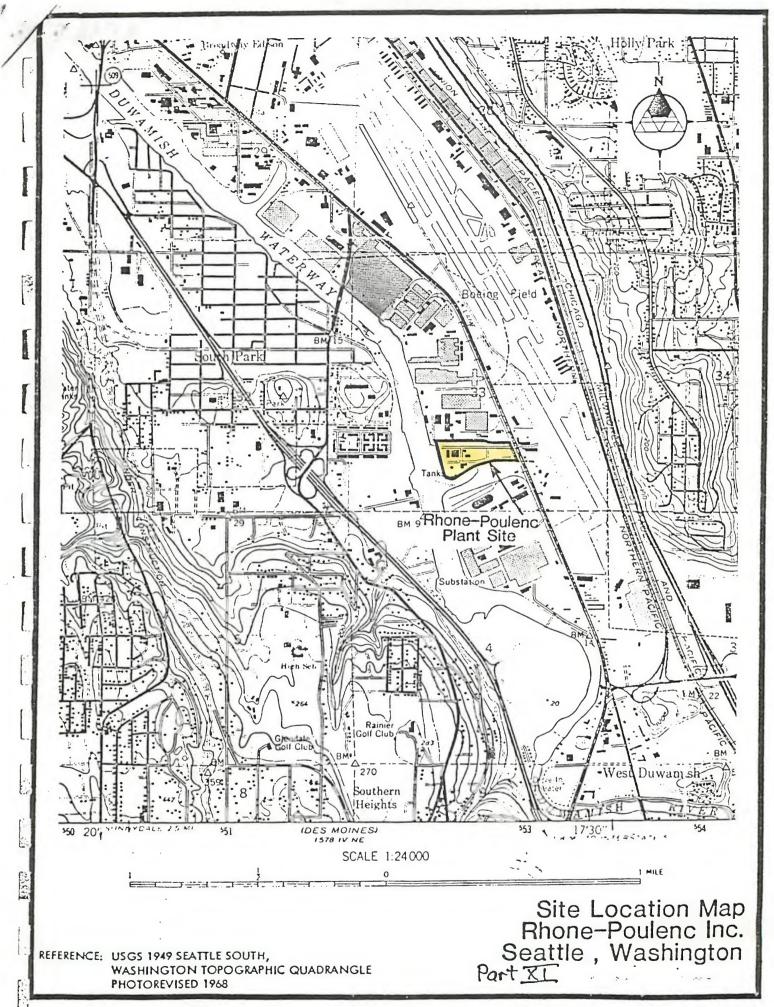


Figure 1

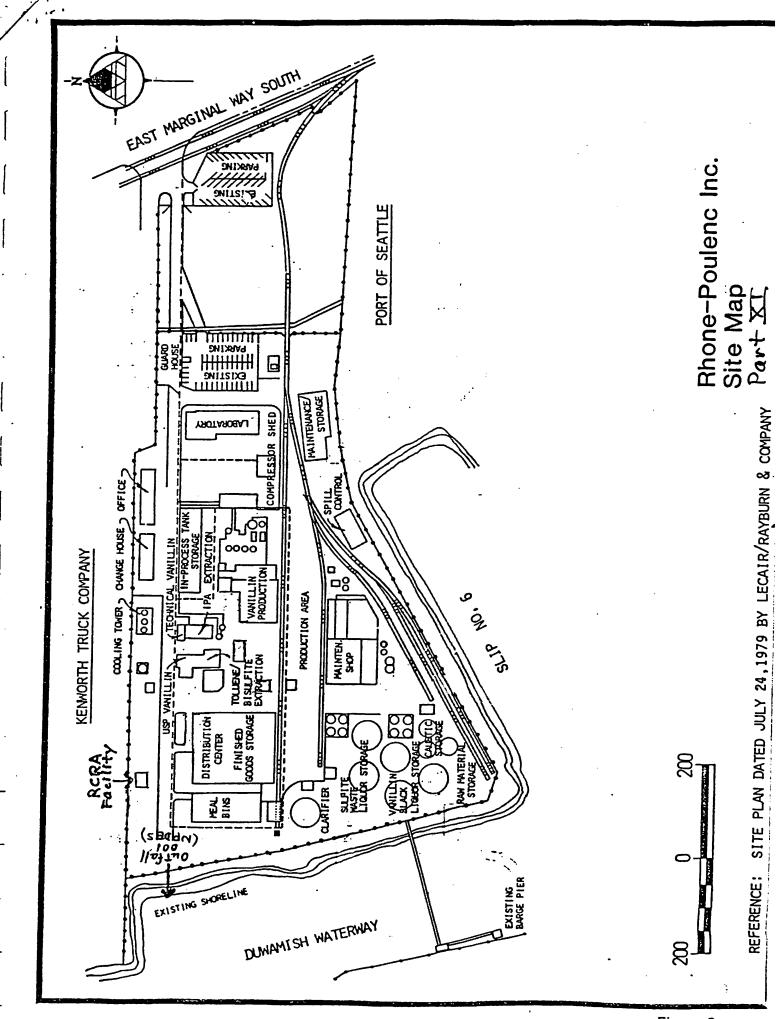


Figure 2

The second secon	rpe, i.e., i	12 characters/inch).		Contract of the Contract of th	d OMB No. 158-S80004
3 SEPA		U.S. ENVIRONMENTAL PROT ZARDOUS WASTE PERN Consolidated Permits his information is required under S	AIT APPLICATION  Program	I. EPA I.D. N	NUMBER 2 0 0 2 7 2 3 0 2 7 2 3
FOR OFFICIAL USE ONLY					
APPROVED (yr., mo., & day			COMMENTS		
23 24	29				
II. FIRST OR REVISED APP	LICATIO	NO			
Place an "X" in the appropriate bore revised application. If this is your EPA I.D. Number in Item I above.	first appl	B below (mark one box only) to i ication and you already know you	indicate whether this is the first app or facility's EPA I.D. Number, or if t	lication you a his is a revised	re submitting for your facility or application, enter your facility'
1. EXISTING FACILITY	(See insti Comple	" below and provide the appropria ructions for definition of "existing te item below.) ING FACILITIES, PROVIDE THE	?" facility.	2.NEW FAC	ILITY (Complete item below.)  FOR NEW FACILITII  PROVIDE THE DATE  (vr., mo., & day) OPEI
8 OP (us	e the box	N BEGAN OR THE DATE CONST es to the left)	TRUCTION COMMENCED	73 74 75 76	TION BEGAN OR IS EXPECTED TO BEGI
B. REVISED APPLICATION  X 1. FACILITY HAS INTE		"X" below and complete Item I $\mathfrak a$		2. FACILIT	Y HAS A RCRA PERMIT
III. PROCESSES — CODES A	ND DES	SIGN CAPACITIES	THE RESERVE OF THE PERSON NAMED IN		The Control of the Co
entering codes. If more lines a describe the process (including B. PROCESS DESIGN CAPACIT'  1. AMOUNT — Enter the amount of the control of th	re needed its design Y — For e ount. or each am	I, enter the code(s) in the space pro- capacity) in the space provided or each code entered in column A ent- nount entered in column B(1), entered	er the capacity of the process.	t is not includ	ed in the list of codes below, the
<ol><li>UNIT OF MEASURE — Fo measure used. Only the un</li></ol>	its of mea	sure that are listed below should b	e used.	isere, codes ber	ow that describes the unit of
UNIT OF MEASURE — For measure used. Only the un	PRO- CESS	asure that are listed below should b APPROPRIATE UNITS OF MEASURE FOR PROCESS	e used.	PRO- CESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS
UNIT OF MEASURE — Fo measure used. Only the un  PROCESS.	PRO-	APPROPRIATE UNITS OF	PROCESS	PRO-	APPROPRIATE UNITS OF
PROCESS Storage:	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS	PROCESS Treatment:	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
measure used. Only the un	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
PROCESS  Storage: CONTAINER (barrel, drum, etc. TANK WASTE PILE	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS  Treatment: TANK SURFACE IMPOUNDMENT	PRO- CESS CODE T01 T02	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY  GALLONS PER DAY OR LITERS PER DAY GALLONS PER DAY OR LITERS PER DAY
PROCESS  Storage: CONTAINER (barrel, drum, etc. TANK WASTE PILE SURFACE IMPOUNDMENT Disposal:	PRO- CESS CODE .) S01 S02 S03 S04	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY  GALLONS OR LITERS GALLONS OR LITERS CUBIC YARDS OR CUBIC METERS GALLONS OR LITERS	PROCESS Treatment: TANK	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY  GALLONS PER DAY OR LITERS PER DAY GALLONS PER DAY OR
PROCESS  Storage: CONTAINER (barrel, drum, etc. TANK WASTE PILE SURFACE IMPOUNDMENT	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY  GALLONS OR LITERS GALLONS OR LITERS CUBIC YARDS OR CUBIC METERS GALLONS OR LITERS  GALLONS OR LITERS	PROCESS  Treatment: TANK SURFACE IMPOUNDMENT	PRO- CESS CODE T01 T02 T03	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY  GALLONS PER DAY OR LITERS PER DAY GALLONS PER DAY TONS PER HOUR OR METRIC TONS PER HOUR: GALLONS PER HOUR OR

<ol> <li>AMOUNT — Enter the amount.</li> <li>UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.</li> </ol>									
PROCESS	PRO- CESS CODE	MEASURE	ATE UNITS OF FOR PROCESS I CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY			
Storage:				Treatment:					
CONTAINER (barrel, drum, etc.)	S01	GALLONS		TANK	T01	GALLONS PER DAY OR			
TANK WASTE PILE	S02 S03	GALLONS C		SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR			
SURFACE IMPOUNDMENT	504	CUBIC MET	ERS	INCINERATOR	т03	LITERS PER DAY TONS PER HOUR OR			
	504	GALLONS	OR LITERS	INCINERATOR	103	METRIC TONS PER HOUR:			
Disposal:						GALLONS PER HOUR OR LITERS PER HOUR			
INJECTION WELL LANDFILL		GALLONS C ACRE-FEET would cover depth of one HECTARE-N	(the volume that one acre to a foot) OR	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner-	T04	GALLONS PER DAY OR LITERS PER DAY			
LAND APPLICATION		ACRES OR	HECTARES	ators. Describe the processes in the space provided: Item III-C.)					
OCEAN DISPOSAL	D82	GALLONS P	DAY	the space provided; Item III-C.)					
SURFACE IMPOUNDMENT	D83	GALLONS	OR LITERS						
	UNIT	URE		UNIT OF MEASURE		UNIT OF MEASURE			
UNIT OF MEASURE	COL	DE	UNIT OF MEASURE	CODE UNI	IT OF MI	EASURE CODE			
GALLONS. G LITERS PER DAY. V ACRE-FEET. A LITERS L TONS PER HOUR. D HECTARE-METER. F CUBIC YARDS. Y METRIC TONS PER HOUR. W ACRES. B CUBIC METERS . C GALLONS PER HOUR. E HECTARES. Q GALLONS PER DAY. U LITERS PER HOUR. H									
EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.									

B. PROCESS DESIGN CAPACITY

1. AMOUNT

BER

A. PRO

CESS

BER

A. PRO-CESS CODE

DUP

B. PROCESS DESIGN CAPACITY

FOR

OFFICIAL

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES ( $code$ " $T04$ ").	FOR EACH PROCESS ENTERED HERE
INCLUDE DESIGN CARACITY	

#### IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

  In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA		C. UNIT	D. PROCESSES					
LINE NO.	HAZARD. WASTENO (enter code)	B. ESTIMATED ANNUAL	OF MEA- SURE (enter code)	1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
X-1	K 0 5 4	900	P	T 0 3 D 8 0					
X-2	D 0 0 2	400	P	T 0 3 D 8 0					
X-3	D 0 0 1	100	P	T 0 3 D 8 0					
X-4	D 0 0 2				included with above				

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL I					AL USE ONLY					
W W	A	D	0	0	9282302 1		1	W 1 2		DUP		13 14 15 23 - 26
IV.				- /	ON OF HAZARDOUS WAST			nued)			-	D. PROCESSES
LINE NO.	ZO WASTENO (enter code)		D. 10 de)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	OF N SU (er co	MEA- IRE iter de)	27 - 20	1. PROCESS CODES (enter)			2. PROCESS DESCRIPTION (if a code is not entered in D(1))	
1	D	0	٥	26	10 000		Г	Soa	1 1	31-1-	21 23	
2	F	0	0	2	250	1	P	SOI				
3					100	-	Г	s o a				
4					500	1	p	501				State Dangerous Wastes
5					25	-	Г	SOA	501			
6								I I				
7								1				
8												
9												
10												
11								1-1-				
12								l - l - l -				
13									1		1 1	
14												
15												
16								1-1-			101	
17								1-1-				
18								Y				
19												
20												
21								1.15			1 1	
22			1	A	No. 14 Telephone							
23												
24												
25									1.1	1-1		
26				24				1 1	1.1	1 1	11	

EPA Form 3510-3 (6-80)

**CONTINUE ON PAGE 5** 

## HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. Name of Insurer, National Union Fire Insurance Company of Pittsburgh, Pa., of 70 Pine Street, New York, N.Y. 10270 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Rhone-Poulenc Inc. (te "Insured"), of CN 5266 Princeton, New Jersey 08543 in connection with the insured obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

Location

Liability Coverage

Sudden

Seattle, WA 9229 E. Marginal Way South Seattle, WA 98108 1,000,000/2,000,000

The limits of liability are \$3,000,000 each occurrence and \$6,000,000 annual aggregate exclusive of legal defense costs. The coverage is provided under policy number  $\frac{PRM}{7063060}$  issued on 8/18/87. The effective date of said policy is 8/18/87.

- 2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
  - a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
  - b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any decuctible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
  - c) Whenever requested by a Regional Administrator of the U.S.
    Environmental Protection Agency (EPA), the Insurer agrees to
    furnish to the Regional Administrator a signed duplicate original
    of the policy and all endorsements.
  - d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrative(s) or the EPA Region(s) in which the facilities are located.

### HAZARDOUS GASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

Name of Insgrey. National Union Fire Insurance Company of Pittsburgh. Pa., of 70 Pine Street, New York, N.Y. 10270 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Rhone-Poulenc Inc. (to "Insured"), of CN 5286 Princeton. Arm Jorsey 08543 in connection with the insured obligation to demonstrate financial responsibility under 40 CFR 284.147 or 285.147. The coverage applies at:

hotation

. :

. :

Liability Coverage

1.000.000/2.000,000

Sudden

Seattle, WA

0229 E. Marginal Way South

Senttle, WA 98108

The limits of liability are \$3,000.000 each occurrence and \$6,000.000 annual aggregate evaluaive of legal defense costs. The caverage is provided under policy number PRM 7063060 issued on 3/18/87. The effective date of said policy is 8/18/87.

- The insurer further certifies the following with respect to the insurance described in Paragraph 1:
- al Bankruptcy or insolvency of the insured shall not relieve the insurer of its obligations under the policy.
- b) The Insurer in Hable for the payment of amounts within any deductible applicable to the policy with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any decuctible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.117(f).
- c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the lasurer agrees to furnish to the Regional Administrator a signed deplicate original of the policy and all endorsements.
  - d) Cancellation of the insurance, whether by the insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrative(s) or the EPA Region(s) in which the facilities are located.

e) Any other termination of the insurance will be effective only upon notice and only after the expiration of thirty (30) days of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facilities are located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Signature of Authorized representative of Insurer

e) Any other termination of the insurance will be effective only upon notice and only after the expiration of thirty (20) days of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facilities are located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Signature of Authorized representative of insurer

Line Constant



#### IRREVOCABLE LETTER OF CREDIT NO. 810766

THE DIRECTOR
Washington State Department of Ecology
Northeast Regional Office
4350 150th Avenue North East
Redmond, Washington 98052

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of Credit No.810766 in your favor, at the request and for the account of Rhone Poulenc, Inc., 9229 E. Marginal Way South, Seattle, Washington 98108 up to an aggregate amount of (United States Dollars Seventeen Thousand Eight Hundred) U.S.\$17,800.00 available upon presentation of:

- (1) your sight draft, bearing reference of this Letter of Credit No.810766 and
- (2) your signed statement reading as follows " I certify that the amount of the draft is payable pursuant to regulations issued under authority of the Resource Conservation and Recovery Act of 1976 as amended, and the Hazardous Waste Disposal Act as amended (Chapter 70.105 RCW)."

This letter of credit is effective as of July 20, 1988 and shall expire on July 20, 1989, but such expiration date shall be automatically extended for a period of 1 (one) year on July 20, 1989 and on each successive expiration date, unless, at least 120 (one hundred twenty) days before the current expiration date, we notify both you and Rhone Poulenc, Inc. by certified mail that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and Rhone Poulenc, Inc. as shown on the signed return receipts.

Whenever this letter of credit is drawn on under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the standby trust fund of Rhone Poulenc, Inc. in accordance with your instructions.

We certify that the wording of this letter of credit is, with the exception of changes required by Washington State Department of Ecology to assure compliance with the financial requirements of WAC 173-303-400 and/or WAC 173-303-620(10), identical to the wordings specified in 40 CFR 264.151(d) as such regulations were constituted on the date shown immediately below.

This credit is subject to the most recent edition of the Uniform Customs and Practice for Documentary Credits published by the International Chamber of Commerce.

Very truly yours,

BARCLAYS BANK PLC

Pamela Seeley

Authorized Signature

July 19, 1988

Nelson Bernardo Authorized Signature

July 19, 1988

TRREVOCABLE LETTIER OF CREDIT NO. 810766

THE DIELCTOR
Washington State Department of Ecology
Northeast Regional Office
4350 150th Avenue North Fast
Redwond, Washington Sa052

Dear Sir or Madama

Washersby establish our irrevocable Standby Latter of Credit We. <u>810766</u> in your favo:, at the request and for the account of Whone Poulenc, Inc., 9229 E. Marginal Way South, Seattle, Washington 98100 up to an aggregate amount of (United States Dollars Seventeen Thousand Eight Hundred) U.S. \$17,800.00 available upon presentation of:

- (1) your sight draft, bearing reference of this Letter of Credit Mo.8:0765 and
- (2) your signed statement reading as follows? I certify that the amount of the draft is payable pursuint to regulations issued under authority of the Resource Comercation and Recovery not of 1976 as amended, and the Hazardous Waste Disposal not as amended (Chapter 70.105 RCW)."

This letter of credit is effective as of July 20, 1988 and shall expire on July 20, 1989, but social expiration date shall be automatically extended for a period of 1 (one) year on July 20; 1989 and on each successive expiration date, unless, at least 120 (one hundred twenty) days before the current expiration date, we notify both you and Rhone Poulenc, Inc. by certified mail that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and sight draft for 120 days after the date of receipt by both you and sight or receipts.

Whenever this letter of credit is drawn on under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the standby trust fund of Rhone Poulenc, Inc. in accordance with your instructions.

We contify that the wording of this lotter of credit is, with the exception of charges required by Washington State Department of Ecology to assure compliance with the financial requirements of MAC 123-303-400 and/or MAC 173-303-620(IO), identical to the worlings specified in 40 trk 204.151(a) as such regulations were constituted on the date shown immediately below.

This credit is subject to the most recent edition of the Uniform Customs and Practice for Dosgrentery Credits published by the International Chamber of Commerce.

Very truly yours,

BARCLAYS BANK PLC

Panela Secloy Authorized Signature

July 19, 1986

Nelson Bernardo Authorized Signature

July 19, 1988